

Statement of Basis of the Federal Operating Permit

BASF Corporation

Site/Area Name: 1,6 Hexanediols and Neopentyl Glycol Complex

Physical location: 602 Copper Rd

Nearest City: Freeport

County: Brazoria

Permit Number: O2158

Project Type: Minor Revision

Standard Industrial Classification (SIC) Code: 2869

SIC Name: Industrial Organic Chemicals

This Statement of Basis sets forth the legal and factual basis for the draft changes to the permit conditions resulting from the minor revision project in accordance with 30 TAC §122.201(a)(4). The applicant has submitted an application for a minor permit revision per §§ 122.215-217. This document may include the following information:

- A description of the facility/area process description;
- A description of the revision project;
- A basis for applying permit shields;
- A list of the federal regulatory applicability determinations;
- A table listing the determination of applicable requirements;
- A list of the New Source Review Requirements;
- The rationale for periodic monitoring methods selected;
- The rationale for compliance assurance methods selected;
- A compliance status; and
- A list of available unit attribute forms.

Prepared on: March 2, 2015

Operating Permit Basis of Determination

Description of Revisions

Special Terms & Conditions have been updated. A Special Term & Condition that pertains to adding a new flow meter, which was previously added during the last renewal, has been removed. The deviation limit for storage tank 5-8-D8550, per [G]§60.112b(a)(3), has been updated. The issuance date for NSR 40799/PSDTX959 has been updated. The issuance date for NSR 7223A/PSDTX193M3 has been updated.

Permit Area Process Description

1,6 Hexanediols Complex

This application area produces three products from feeds of dicarboxylic acid solution (DCS): methanol, sulfuric acid (catalyst), and hydrogen. The feed stream of DCS is dewatered before esterification. Depending on market demand, these esters (C5 and C6) are transesterified, cyclized, and/or hydrogenated into caprolactone (CLO), 1,5 pentanediol and 1,6 hexanediol (HDO[®]).

Neopentyl Glycol Complex

In the Neopentyl Glycol Facility, formaldehyde is reacted with isobutyraldehyde to produce neopentyl glycol. The plant consists of three sections: synthesis, hydrogenation, and distillation.

Formaldehyde and isobutyraldehyde are reacted in the presence of catalyst in the synthesis section. In the next stages, intermediate product is reacted with hydrogen. Finally the product is distilled to the desired purity, the finished Neol[®] solution. Vents from the process are diverted to the incinerator or to scrubber. Liquid waste streams from the process are fed to the incinerator and to the site wastewater treatment plant.

FOPs at Site

The “application area” consists of the emission units and that portion of the site included in the application and this permit. Multiple FOPs may be issued to a site in accordance with 30 TAC § 122.201(e). When there is only one area for the site, then the application information and permit will include all units at the site. Additional FOPs that exist at the site, if any, are listed below.

Additional FOPs: O1536, O1925, O1926, O1927, O1928, O2907

Major Source Pollutants

The table below specifies the pollutants for which the site is a major source:

Major Pollutants	VOC, SO ₂ , PM, NO _x , HAPS, CO
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Reading State of Texas’ Federal Operating Permit

The Title V Federal Operating Permit (FOP) lists all state and federal air emission regulations and New Source Review (NSR) authorizations (collectively known as “applicable requirements”) that apply at a particular site or permit area (in the event a site has multiple FOPs). **The FOP does not authorize new emissions or new construction activities.** The FOP begins with an introductory page which is common to all Title V permits. This page gives the details of the company, states the authority of the issuing agency, requires the company to operate in accordance with this permit and 30 Texas Administrative Code (TAC) Chapter 122, requires adherence with NSR requirements of 30 TAC Chapter 116, and finally indicates the permit number and the issuance date.

This is followed by the table of contents, which is generally composed of the following elements. Not all permits will have all of the elements.

- General Terms and Conditions
- Special Terms and Conditions
 - Emissions Limitations and Standards, Monitoring and Testing, and Recordkeeping and Reporting
 - Additional Monitoring Requirements
 - New Source Review Authorization Requirements
 - Compliance Requirements
 - Protection of Stratosphere Ozone
 - Permit Location
 - Permit Shield (30 TAC § 122.148)
- Attachments
 - Applicable Requirements Summary
 - Unit Summary
 - Applicable Requirements Summary
 - Additional Monitoring Requirements
 - Permit Shield
 - New Source Review Authorization References
 - Compliance Plan
 - Alternative Requirements
- Appendix A
 - Acronym list
- Appendix B
 - Copies of major NSR authorizations

General Terms and Conditions

The General Terms and Conditions are the same and appear in all permits. The first paragraph lists the specific citations for 30 TAC Chapter 122 requirements that apply to all Title V permit holders. The second paragraph describes the requirements for record retention. The third paragraph provides details for voiding the permit, if applicable. The fourth paragraph states that the permit holder shall comply with the requirements of 30 TAC Chapter 116 by obtaining a New Source Review authorization prior to new construction or modification of emission units located in the area covered by this permit. The fifth paragraph provides details on submission of reports required by the permit.

Special Terms and Conditions

Emissions Limitations and Standards, Monitoring and Testing, and Recordkeeping and Reporting. The TCEQ has designated certain applicable requirements as site-wide requirements. A site-wide requirement is a requirement that applies uniformly to all the units or activities at the site. Units with only site-wide requirements are addressed on Form OP-REQ1 and are not required to be listed separately on a OP-UA Form or Form OP-SUM. Form OP-SUM must list all units addressed in the application and provide identifying information, applicable OP-UA Forms, and preconstruction authorizations. The various OP-UA Forms provide the characteristics of each unit from which applicable requirements are established. Some exceptions exist as a few units may have both site-wide requirements and unit specific requirements.

Other conditions. The other entries under special terms and conditions are in general terms referring to compliance with the more detailed data listed in the attachments.

Attachments

Applicable Requirements Summary. The first attachment, the Applicable Requirements Summary, has two tables, addressing unit specific requirements. The first table, the Unit Summary, includes a list of units with applicable requirements, the unit type, the applicable regulation, and the requirement driver. The intent of the requirement driver is to inform the reader that a given unit may have several different operating scenarios and the differences between those operating scenarios.

The applicable requirements summary table provides the detailed citations of the rules that apply to the various units. For each unit and operating scenario, there is an added modifier called the “index number,” detailed citations specifying monitoring and testing requirements, recordkeeping requirements, and reporting requirements. The data for this table are based on data supplied by the applicant on the OP-SUM and various OP-UA forms.

Additional Monitoring Requirement. The next attachment includes additional monitoring the applicant must perform to ensure compliance with the applicable standard. Compliance assurance monitoring (CAM) is often required to provide a reasonable assurance of compliance with applicable emission limitations/standards for large emission units that use control devices to achieve compliance with applicant requirements. When necessary, periodic monitoring (PM) requirements are specified for certain parameters (i.e. feed rates, flow rates, temperature, fuel type and consumption, etc.) to determine if a term and condition or emission unit is operating within specified limits to control emissions. These additional monitoring approaches may be required for two reasons. First, the applicable rules do not adequately specify monitoring requirements (exception- Maximum Achievable Control Technology Standards (MACTs) generally have sufficient monitoring), and second, monitoring may be required to fill gaps in the monitoring requirements of certain applicable requirements. In situations where the NSR permit is the applicable requirement requiring extra monitoring for a specific emission unit, the preferred solution is to have the monitoring requirements in the NSR permit updated so that all NSR requirements are consolidated in the NSR permit.

Permit Shield. A permit may or may not have a permit shield, depending on whether an applicant has applied for, and justified the granting of, a permit shield. A permit shield is a special condition included in the permit document stating that compliance with the conditions of the permit shall be deemed compliance with the specified potentially applicable requirement(s) or specified applicable state-only requirement(s).

New Source Review Authorization References. All activities which are related to emissions in the state of Texas must have a NSR authorization prior to beginning construction. This section lists all units in the permit and the NSR authorization that allowed the unit to be constructed or modified. Units that do not have unit specific applicable requirements other than the NSR authorization do not need to be listed in this attachment. While NSR permits are not physically a part of the Title V permit, they are legally incorporated into the Title V permit by reference. Those NSR permits whose emissions exceed certain PSD/NA thresholds must also undergo a Federal review of federally regulated pollutants in addition to review for state regulated pollutants.

Compliance Plan. A permit may have a compliance schedule attachment for listing corrective actions plans for any emission unit that is out of compliance with an applicable requirement.

Alternative Requirements. This attachment will list any alternative monitoring plans or alternative means of compliance for applicable requirements that have been approved by the EPA Administrator and/or the TCEQ Executive Director.

Appendix A

Acronym list. This attachment lists the common acronyms used when discussing the FOPs.

Appendix B

Copies of major NSR authorizations applicable to the units covered by this permit have been included in this Appendix, to ensure that all interested persons can access those authorizations.

Stationary vents subject to 30 TAC Chapter 111, Subchapter A, § 111.111(a)(1)(B) addressed in the Special Terms and Conditions

The site contains stationary vents with a flowrate less than 100,000 actual cubic feet per minute (acfm) and constructed after January 31, 1972 which are limited, over a six-minute average, to 20% opacity as required by 30 TAC § 111.111(a)(1)(B). As a site may have a large number of stationary vents that fall into this category, they are not required to be listed individually in the permit's Applicable Requirement Summary. This is consistent with EPA's White Paper for Streamlined Development of Part 70 Permit Applications, July 10, 1995, that states that requirements that apply identically to emission units at a site can be treated on a generic basis such as source-wide opacity limits.

Periodic monitoring is specified in Special Term and Condition 3 for stationary vents subject to 30 TAC § 111.111(a)(1)(B) to verify compliance with the 20% opacity limit. These vents are not expected to produce visible emissions during normal operation. The TCEQ evaluated the probability of these sources violating the opacity standards and determined that there is a very low potential that an opacity standard would be exceeded. It was determined that continuous monitoring for these sources is not warranted as there would be very limited environmental benefit in continuously monitoring sources that have a low potential to produce visible emissions. Therefore, the TCEQ set the visible observation monitoring frequency for these sources to once per calendar quarter.

The TCEQ has exempted vents that are not capable of producing visible emissions from periodic monitoring requirements. These vents include sources of colorless VOCs, non-fuming liquids, and other materials that cannot produce emissions that obstruct the transmission of light. Passive ventilation vents, such as plumbing vents, are also included in this category. Since this category of vents are not capable of producing opacity due to the physical or chemical characteristics of the emission source, periodic monitoring is not required as it would not yield any additional data to assure compliance with the 20% opacity standard of 30 TAC § 111.111(a)(1)(B).

In the event that visible emissions are detected, either through the quarterly observation or other credible evidence, such as observations from company personnel, the permit holder shall either report a deviation or perform a Test Method 9 observation to determine the opacity consistent with the 6-minute averaging time specified in 30 TAC § 111.111(a)(1)(B). An additional provision is included to monitor combustion sources more frequently than quarterly if alternate fuels are burned for periods greater than 24 consecutive hours. This will address possible emissions that may arise when switching fuel types.

Stationary Vents subject to 30 TAC Chapter 111 not addressed in the Special Terms and Conditions

All other stationary vents subject to 30 TAC Chapter 111 not covered in the Special Terms and Conditions are listed in the permit's Applicable Requirement Summary. The basis for the applicability determinations for these vents are listed in the Determination of Applicable Requirements table.

Federal Regulatory Applicability Determinations

The following chart summarizes the applicability of the principal air pollution regulatory programs to the permit area:

Regulatory Program	Applicability (Yes/No)
Prevention of Significant Deterioration (PSD)	Yes
Nonattainment New Source Review (NNSR)	No
Minor NSR	Yes
40 CFR Part 60 - New Source Performance Standards	Yes
40 CFR Part 61 - National Emission Standards for Hazardous Air Pollutants (NESHAPs)	No
40 CFR Part 63 - NESHAPs for Source Categories	Yes
Title IV (Acid Rain) of the Clean Air Act (CAA)	No
Title V (Federal Operating Permits) of the CAA	Yes
Title VI (Stratospheric Ozone Protection) of the CAA	Yes
CAIR (Clean Air Interstate Rule)	No

Basis for Applying Permit Shields

An operating permit applicant has the opportunity to specifically request a permit shield to document that specific applicable requirements do not apply to emission units in the permit. A permit shield is a special condition stating that compliance with the conditions of the permit shall be deemed compliance with the specified potentially applicable requirements or specified potentially applicable state-only requirements. A permit shield has been requested in the application for specific emission units. For the permit shield requests that have been approved, the basis of determination for regulations that the owner/operator need not comply with are located in the "Permit Shield" attachment of the permit.

Insignificant Activities

In general, units not meeting the criteria for inclusion on either Form OP-SUM or Form OP-REQ1 are not required to be addressed in the operating permit application. Examples of these types of units include, but are not limited to, the following:

1. Office activities such as photocopying, blueprint copying, and photographic processes.
2. Sanitary sewage collection and treatment facilities other than those used to incinerate wastewater treatment plant sludge. Stacks or vents for sanitary sewer plumbing traps are also included.
3. Food preparation facilities including, but not limited to, restaurants and cafeterias used for preparing food or beverages primarily for consumption on the premises.
4. Outdoor barbecue pits, campfires, and fireplaces.
5. Laundry dryers, extractors, and tumblers processing bedding, clothing, or other fabric items generated primarily at the premises. This does not include emissions from dry cleaning systems using perchloroethylene or petroleum solvents.
6. Facilities storing only dry, sweet natural gas, including natural gas pressure regulator vents.
7. Any air separation or other industrial gas production, storage, or packaging facility. Industrial gases, for purposes of this list, include only oxygen, nitrogen, helium, neon, argon, krypton, and xenon.
8. Storage and handling of sealed portable containers, cylinders, or sealed drums.

9. Vehicle exhaust from maintenance or repair shops.
10. Storage and use of non-VOC products or equipment for maintaining motor vehicles operated at the site (including but not limited to, antifreeze and fuel additives).
11. Air contaminant detectors and recorders, combustion controllers and shut-off devices, product analyzers, laboratory analyzers, continuous emissions monitors, other analyzers and monitors, and emissions associated with sampling activities. Exception to this category includes sampling activities that are deemed fugitive emissions and under a regulatory leak detection and repair program.
12. Bench scale laboratory equipment and laboratory equipment used exclusively for chemical and physical analysis, including but not limited to, assorted vacuum producing devices and laboratory fume hoods.
13. Steam vents, steam leaks, and steam safety relief valves, provided the steam (or boiler feedwater) has not contacted other materials or fluids containing regulated air pollutants other than boiler water treatment chemicals.
14. Storage of water that has not contacted other materials or fluids containing regulated air pollutants other than boiler water treatment chemicals.
15. Well cellars.
16. Fire or emergency response equipment and training, including but not limited to, use of fire control equipment including equipment testing and training, and open burning of materials or fuels associated with firefighting training.
17. Crucible or pot furnaces with a brim full capacity of less than 450 cubic inches of any molten metal.
18. Equipment used exclusively for the melting or application of wax.
19. All closed tumblers used for the cleaning or deburring of metal products without abrasive blasting, and all open tumblers with a batch capacity of 1,000 lbs. or less.
20. Shell core and shell mold manufacturing machines.
21. Sand or investment molds with a capacity of 100 lbs. or less used for the casting of metals;
22. Equipment used for inspection of metal products.
23. Equipment used exclusively for rolling, forging, pressing, drawing, spinning, or extruding either hot or cold metals by some mechanical means.
24. Instrument systems utilizing air, natural gas, nitrogen, oxygen, carbon dioxide, helium, neon, argon, krypton, and xenon.
25. Battery recharging areas.
26. Brazing, soldering, or welding equipment.

Determination of Applicable Requirements

The tables below include the applicability determinations for the emission units, the index number(s) where applicable, and all relevant unit attribute information used to form the basis of the applicability determination. The unit attribute information is a description of the physical properties of an emission unit which is used to determine the requirements to which the permit holder must comply. For more information about the descriptions of the unit attributes specific Unit Attribute Forms may be viewed at www.tceq.texas.gov/permitting/air/nav/air_all_ua_forms.html.

A list of unit attribute forms is included at the end of this document. Some examples of unit attributes include construction date; product stored in a tank; boiler fuel type; etc.. Generally, multiple attributes are needed to determine the requirements for a given emission unit and index number. The table below lists these attributes in the column entitled "Basis of Determination." Attributes that demonstrate that an applicable requirement applies will be the factual basis for the specific citations in an applicable requirement that apply to a unit for that index number. The TCEQ Air Permits Division has developed flowcharts for determining applicability of state and federal regulations based on the unit attribute information in a Decision Support System (DSS). These flowcharts can be accessed via the internet at www.tceq.texas.gov/permitting/air/nav/air_supportsys.html. The Air Permits Division staff may also be contacted for assistance at (512) 239-1250.

The attributes for each unit and corresponding index number provide the basis for determining the specific legal citations in an applicable requirement that apply, including emission limitations or standards, monitoring, recordkeeping, and reporting. The rules were found to apply or not apply by using the unit attributes as answers to decision questions found in the flowcharts of the DSS. Some additional attributes indicate which legal citations of a rule apply. The legal citations that apply to each emission unit may be found in the Applicable Requirements Summary table of the draft permit. There may be some entries or rows of units and rules not found in the permit, or if the permit contains a permit shield, repeated in the permit shield area. These are sets of attributes that describe negative applicability, or; in other words, the reason why a potentially applicable requirement does not apply.

If applicability determinations have been made which differ from the available flowcharts, an explanation of the decisions involved in the applicability determination is specified in the column “Changes and Exceptions to RRT.” If there were no exceptions to the DSS, then this column has been removed.

The draft permit includes all emission limitations or standards, monitoring, recordkeeping and reporting required by each applicable requirement. If an applicable requirement does not require monitoring, recordkeeping, or reporting, the word “None” will appear in the Applicable Requirements Summary table. If additional periodic monitoring is required for an applicable requirement, it will be explained in detail in the portion of this document entitled “Rationale for Compliance Assurance Monitoring (CAM)/ Periodic Monitoring Methods Selected.”

When attributes demonstrate that a unit is not subject to an applicable requirement, the applicant may request a permit shield for those items. The portion of this document entitled “Basis for Applying Permit Shields” specifies which units, if any, have a permit shield.

Operational Flexibility

When an emission unit has multiple operating scenarios, it will have a different index number associated with each operating condition. This means that units are permitted to operate under multiple operating conditions. The applicable requirements for each operating condition are determined by a unique set of unit attributes. For example, a tank may store two different products at different points in time. The tank may, therefore, need to comply with two distinct sets of requirements, depending on the product that is stored. Both sets of requirements are included in the permit, so that the permit holder may store either product in the tank.

Determination of Applicable Requirements

Unit ID	Regulation	Index Number	Basis of Determination*
5-8-D8050	30 TAC Chapter 115, Storage of VOCs	R115-1	<p>Today's Date = Today's date is March 1, 2013 or later.</p> <p>Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.</p> <p>Tank Description = Tank using a submerged fill pipe and vapor recovery system</p> <p>True Vapor Pressure = True vapor pressure is less than 1.0 psia</p> <p>Product Stored = VOC other than crude oil or condensate</p> <p>Storage Capacity = Capacity is greater than 40,000 gallons</p>
5-8-D8050	40 CFR Part 60, Subpart Kb	60Kb-1	<p>Product Stored = Volatile organic liquid</p> <p>Storage Capacity = Capacity is greater than or equal to 39,900 gallons (151,000 liters)</p> <p>Maximum True Vapor Pressure = True vapor pressure is greater than or equal to 0.5 psia but less than 0.75 psia</p> <p>Storage Vessel Description = CVS and control device other than a flare (fixed roof)</p>
5-8-D8150	30 TAC Chapter 115, Storage of VOCs	R115-1	<p>Today's Date = Today's date is March 1, 2013 or later.</p> <p>Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.</p> <p>Tank Description = Tank does not require emission controls</p> <p>True Vapor Pressure = True vapor pressure is less than 1.0 psia</p> <p>Product Stored = VOC other than crude oil or condensate</p> <p>Storage Capacity = Capacity is greater than 1,000 gallons but less than or equal to 25,000 gallons</p>
5-8-D8150	40 CFR Part 60, Subpart Kb	60Kb-1	<p>Product Stored = Volatile organic liquid</p> <p>Storage Capacity = Capacity is less than 10,600 gallons (40,000 liters)</p>
5-8-D8250	30 TAC Chapter 115, Storage of VOCs	R115-1	<p>Today's Date = Today's date is March 1, 2013 or later.</p> <p>Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.</p> <p>Product Stored = VOC other than crude oil or condensate</p> <p>Storage Capacity = Capacity is less than or equal to 1,000 gallons</p>
5-8-D8270	30 TAC Chapter 115, Storage of VOCs	R115-1	<p>Today's Date = Today's date is March 1, 2013 or later.</p> <p>Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.</p> <p>Tank Description = Tank using a vapor recovery system (VRS)</p> <p>True Vapor Pressure = True vapor pressure is greater than or equal to 1.5 psia</p> <p>Product Stored = VOC other than crude oil or condensate</p> <p>Storage Capacity = Capacity is greater than 1,000 gallons but less than or equal to 25,000 gallons</p> <p>Control Device Type = Direct-flame incinerator</p>

Unit ID	Regulation	Index Number	Basis of Determination*
5-8-D8270	40 CFR Part 60, Subpart Kb	60Kb-1	Product Stored = Volatile organic liquid Storage Capacity = Capacity is less than 10,600 gallons (40,000 liters)
5-8-D8440	40 CFR Part 60, Subpart Kb	60Kb-1	Product Stored = Volatile organic liquid Storage Capacity = Capacity is less than 10,600 gallons (40,000 liters)
5-8-D8550	30 TAC Chapter 115, Storage of VOCs	R115-1	Today's Date = Today's date is March 1, 2013 or later. Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria. Tank Description = Tank using a vapor recovery system (VRS) True Vapor Pressure = True vapor pressure is greater than or equal to 1.5 psia Product Stored = VOC other than crude oil or condensate Storage Capacity = Capacity is greater than 40,000 gallons Control Device Type = Other control device
5-8-D8550	40 CFR Part 60, Subpart Kb	60Kb-1	Product Stored = Volatile organic liquid Storage Capacity = Capacity is greater than or equal to 39,900 gallons (151,000 liters) Maximum True Vapor Pressure = True vapor pressure is greater than or equal to 0.75 psia but less than 11.1 psia Storage Vessel Description = CVS and control device other than a flare (fixed roof)
5-8-D8560	30 TAC Chapter 115, Storage of VOCs	R115-1	Today's Date = Today's date is March 1, 2013 or later. Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria. Tank Description = Tank does not require emission controls True Vapor Pressure = True vapor pressure is less than 1.0 psia Product Stored = VOC other than crude oil or condensate Storage Capacity = Capacity is greater than 40,000 gallons
5-8-D8560	40 CFR Part 60, Subpart Kb	60Kb-1	Product Stored = Volatile organic liquid Storage Capacity = Capacity is greater than or equal to 39,900 gallons (151,000 liters) Maximum True Vapor Pressure = True vapor pressure is less than 0.5 psia
5-8-D8570	30 TAC Chapter 115, Storage of VOCs	R115-1	Today's Date = Today's date is March 1, 2013 or later. Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria. Tank Description = Tank does not require emission controls True Vapor Pressure = True vapor pressure is less than 1.0 psia Product Stored = VOC other than crude oil or condensate Storage Capacity = Capacity is greater than 40,000 gallons
5-8-D8570	40 CFR Part 60, Subpart Kb	60Kb-1	Product Stored = Volatile organic liquid Storage Capacity = Capacity is greater than or equal to 39,900 gallons (151,000 liters) Maximum True Vapor Pressure = True vapor pressure is less than 0.5 psia

Unit ID	Regulation	Index Number	Basis of Determination*
5-9-D1000	30 TAC Chapter 115, Storage of VOCs	R115-1	<p>Today's Date = Today's date is March 1, 2013 or later.</p> <p>Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.</p> <p>Tank Description = Tank using a vapor recovery system (VRS)</p> <p>True Vapor Pressure = True vapor pressure is greater than or equal to 1.5 psia</p> <p>Product Stored = VOC other than crude oil or condensate</p> <p>Storage Capacity = Capacity is greater than 40,000 gallons</p> <p>Control Device Type = Direct-flame incinerator</p>
5-9-D1000	40 CFR Part 60, Subpart Kb	60Kb-1	<p>Product Stored = Volatile organic liquid</p> <p>Storage Capacity = Capacity is greater than or equal to 39,900 gallons (151,000 liters)</p> <p>Maximum True Vapor Pressure = True vapor pressure is greater than or equal to 0.75 psia but less than 11.1 psia</p> <p>Storage Vessel Description = CVS and control device other than a flare (fixed roof)</p>
5-9-D1000	40 CFR Part 63, Subpart FFFF	63FFFF-1	<p>Alt 63SS Mon Parameters = Alternate monitoring parameters or requirements have not been approved by the Administrator or have not been requested.</p> <p>Determined HAL = The emission stream is determined not to be halogenated.</p> <p>Emission Standard = HAP vapor pressure is < 76.6 and a non-flare CD is being used to meet a ppmv standard per § 63.2470(a)-Table 4.1.b.ii</p> <p>CEMS = A continuous parameter monitoring system is used.</p> <p>HAL Device Type = No halogen scrubber or other halogen reduction device is used.</p> <p>Prior Test = The data from a prior performance test is not used.</p> <p>SS Device Type = Incinerator other than a catalytic incinerator.</p> <p>Meets 63.998(b)(2) = The control device does not meet criteria in § 63.985(b)(2).</p> <p>Test Waiver = The Administrator has not granted a waiver of the performance test or no waiver has been requested.</p> <p>Formaldehyde = The stream does not contain formaldehyde.</p> <p>Designated HAL = The emission stream is not designated as halogenated.</p> <p>Negative Pressure = The closed vent system is operated and maintained at or above atmospheric pressure.</p>
5-9-D1250	30 TAC Chapter 115, Storage of VOCs	R115-1	<p>Today's Date = Today's date is March 1, 2013 or later.</p> <p>Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.</p> <p>Tank Description = Tank using a vapor recovery system (VRS)</p> <p>True Vapor Pressure = True vapor pressure is greater than or equal to 1.5 psia</p> <p>Product Stored = VOC other than crude oil or condensate</p> <p>Storage Capacity = Capacity is greater than 1,000 gallons but less than or equal to 25,000 gallons</p> <p>Control Device Type = Direct-flame incinerator</p>
5-9-D1250	40 CFR Part 60, Subpart Kb	60Kb-1	<p>Product Stored = Volatile organic liquid</p> <p>Storage Capacity = Capacity is greater than or equal to 10,600 gallons (40,000 liters) but less than 19,800 gallons (75,000 liters)</p>

Unit ID	Regulation	Index Number	Basis of Determination*
5-9-D1450	30 TAC Chapter 115, Storage of VOCs	R115-1	<p>Today's Date = Today's date is March 1, 2013 or later.</p> <p>Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.</p> <p>Tank Description = Tank using a vapor recovery system (VRS)</p> <p>True Vapor Pressure = True vapor pressure is greater than or equal to 1.5 psia</p> <p>Product Stored = VOC other than crude oil or condensate</p> <p>Storage Capacity = Capacity is greater than 25,000 gallons but less than or equal to 40,000 gallons</p> <p>Control Device Type = Direct-flame incinerator</p>
5-9-D1450	40 CFR Part 60, Subpart Kb	60Kb-1	<p>Product Stored = Waste mixture of indeterminate or variable composition</p> <p>Storage Capacity = Capacity is greater than or equal to 19,800 gallons (75,000 liters) but less than 39,900 gallons (151,000 liters)</p> <p>Maximum True Vapor Pressure = True vapor pressure is greater than or equal to 4.0 psia but less than 11.1 psia</p> <p>Storage Vessel Description = CVS and control device other than a flare (fixed roof)</p>
5-9-D1450	40 CFR Part 63, Subpart FFFF	63FFFF-1	<p>Combination Of Control Devices = The vent stream is treated using a single control device.</p> <p>Process Wastewater = Tank receives, manages or treats process wastewater as defined in 40 CFR Part 63, Subpart F and 40 CFR § 63.2485(b).</p> <p>Wastewater Tank Usage = The wastewater tank is not used for heating wastewater, treating by means of an exothermic reaction, nor are the contents of the tank sparged.</p> <p>Control Devices = Thermal vapor incinerator.</p> <p>Performance Tests = Performance tests are used to demonstrate that the control device or combination of control devices achieves the appropriate conditions.</p> <p>Wastewater Tank Properties = Properties do not qualify for exemption.</p> <p>2485(h)(3) = The method in 40 CFR § 63.145(i)(2) is used.</p> <p>Emission Control Type = Fixed roof tank vented through a CVS that routes the organic HAP vapors vented from the wastewater tank to a control device.</p> <p>95% Performance Tests = The performance tests are conducted to demonstrate compliance with the 20 ppmv concentration requirements.</p> <p>Compliance With 40 CFR § 63.139(c)(1) = The enclosed combustion device being used meets the 20 ppmv concentration provisions specified in 40 CFR § 63.139(c)(1)(ii).</p> <p>Closed Vent System = Closed vent system is not maintained under negative pressure and is subject to 40 CFR § 63.172.</p> <p>Halogenated = The stream is determined as non-halogenated.</p> <p>Monitoring Options = Control device is using the monitoring parameters specified in Table 13.</p> <p>Bypass Lines = No bypass lines.</p> <p>Alt 63G Mon Parameters = No alternate monitoring parameters have been approved or none have been requested.</p>
5-9-D1451	40 CFR Part 63, Subpart FFFF	63FFFF-1	<p>Process Wastewater = Tank receives, manages or treats process wastewater as defined in 40 CFR Part 63, Subpart F and 40 CFR § 63.2485(b).</p> <p>Wastewater Tank Usage = The wastewater tank is not used for heating wastewater, treating by means of an exothermic reaction, nor are the contents of the tank sparged.</p> <p>Wastewater Tank Properties = Volume of the wastewater tank is greater than 75 m³ but less than 151 m³ and vapor pressure of liquid stored is less than 13.1 kPa.</p>

Unit ID	Regulation	Index Number	Basis of Determination*
5-9-D2000	30 TAC Chapter 115, Storage of VOCs	R115-1	<p>Today's Date = Today's date is March 1, 2013 or later.</p> <p>Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.</p> <p>Tank Description = Tank does not require emission controls</p> <p>True Vapor Pressure = True vapor pressure is less than 1.0 psia</p> <p>Product Stored = VOC other than crude oil or condensate</p> <p>Storage Capacity = Capacity is greater than 1,000 gallons but less than or equal to 25,000 gallons</p>
5-9-D2000	40 CFR Part 60, Subpart Kb	60Kb-1	<p>Product Stored = Volatile organic liquid</p> <p>Storage Capacity = Capacity is greater than or equal to 19,800 gallons (75,000 liters) but less than 39,900 gallons (151,000 liters)</p> <p>Maximum True Vapor Pressure = True vapor pressure is less than 2.2 psia</p>
5-9-D2150	30 TAC Chapter 115, Storage of VOCs	R115-1	<p>Today's Date = Today's date is March 1, 2013 or later.</p> <p>Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.</p> <p>Tank Description = Tank does not require emission controls</p> <p>True Vapor Pressure = True vapor pressure is less than 1.0 psia</p> <p>Product Stored = VOC other than crude oil or condensate</p> <p>Storage Capacity = Capacity is greater than 1,000 gallons but less than or equal to 25,000 gallons</p>
5-9-D2150	40 CFR Part 60, Subpart Kb	60Kb-1	<p>Product Stored = Volatile organic liquid</p> <p>Storage Capacity = Capacity is greater than or equal to 19,800 gallons (75,000 liters) but less than 39,900 gallons (151,000 liters)</p> <p>Maximum True Vapor Pressure = True vapor pressure is less than 2.2 psia</p>
5-9-D2250	30 TAC Chapter 115, Storage of VOCs	R115-1	<p>Today's Date = Today's date is March 1, 2013 or later.</p> <p>Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.</p> <p>Tank Description = Tank does not require emission controls</p> <p>True Vapor Pressure = True vapor pressure is less than 1.0 psia</p> <p>Product Stored = VOC other than crude oil or condensate</p> <p>Storage Capacity = Capacity is greater than 1,000 gallons but less than or equal to 25,000 gallons</p>
5-9-D2250	40 CFR Part 60, Subpart Kb	60Kb-1	<p>Product Stored = Volatile organic liquid</p> <p>Storage Capacity = Capacity is greater than or equal to 19,800 gallons (75,000 liters) but less than 39,900 gallons (151,000 liters)</p> <p>Maximum True Vapor Pressure = True vapor pressure is less than 2.2 psia</p>
5-9-D2260	30 TAC Chapter 115, Storage of VOCs	R115-1	<p>Today's Date = Today's date is March 1, 2013 or later.</p> <p>Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.</p> <p>Tank Description = Tank does not require emission controls</p> <p>True Vapor Pressure = True vapor pressure is less than 1.0 psia</p> <p>Product Stored = VOC other than crude oil or condensate</p>

Unit ID	Regulation	Index Number	Basis of Determination*
			Storage Capacity = Capacity is greater than 40,000 gallons
5-9-D2260	40 CFR Part 60, Subpart Kb	60Kb-1	Product Stored = Volatile organic liquid Storage Capacity = Capacity is greater than or equal to 39,900 gallons (151,000 liters) Maximum True Vapor Pressure = True vapor pressure is less than 0.5 psia
5-9-D2350	30 TAC Chapter 115, Storage of VOCs	R115-1	Today's Date = Today's date is March 1, 2013 or later. Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria. Tank Description = Tank does not require emission controls True Vapor Pressure = True vapor pressure is less than 1.0 psia Product Stored = VOC other than crude oil or condensate Storage Capacity = Capacity is greater than 1,000 gallons but less than or equal to 25,000 gallons
5-9-D2360	30 TAC Chapter 115, Storage of VOCs	R115-1	Today's Date = Today's date is March 1, 2013 or later. Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria. Tank Description = Tank does not require emission controls True Vapor Pressure = True vapor pressure is less than 1.0 psia Product Stored = VOC other than crude oil or condensate Storage Capacity = Capacity is greater than 25,000 gallons but less than or equal to 40,000 gallons
5-9-D2360	40 CFR Part 60, Subpart Kb	60Kb-1	Product Stored = Volatile organic liquid Storage Capacity = Capacity is greater than or equal to 19,800 gallons (75,000 liters) but less than 39,900 gallons (151,000 liters) Maximum True Vapor Pressure = True vapor pressure is less than 2.2 psia
5-9-D2650	30 TAC Chapter 115, Storage of VOCs	R115-1	Today's Date = Today's date is March 1, 2013 or later. Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria. Tank Description = Tank does not require emission controls True Vapor Pressure = True vapor pressure is less than 1.0 psia Product Stored = VOC other than crude oil or condensate Storage Capacity = Capacity is greater than 25,000 gallons but less than or equal to 40,000 gallons
5-9-D2660	30 TAC Chapter 115, Storage of VOCs	R115-1	Today's Date = Today's date is March 1, 2013 or later. Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria. Tank Description = Tank does not require emission controls True Vapor Pressure = True vapor pressure is less than 1.0 psia Product Stored = VOC other than crude oil or condensate Storage Capacity = Capacity is greater than 40,000 gallons

Unit ID	Regulation	Index Number	Basis of Determination*
5-9-D2660	40 CFR Part 60, Subpart Kb	60Kb-1	Product Stored = Volatile organic liquid Storage Capacity = Capacity is greater than or equal to 39,900 gallons (151,000 liters) Maximum True Vapor Pressure = True vapor pressure is less than 0.5 psia
5-9-D2800	40 CFR Part 63, Subpart FFFF	63FFFF-1	Process Wastewater = Tank receives, manages or treats process wastewater as defined in 40 CFR Part 63, Subpart F and 40 CFR § 63.2485(b). Wastewater Tank Usage = The wastewater tank is not used for heating wastewater, treating by means of an exothermic reaction, nor are the contents of the tank sparged. Wastewater Tank Properties = Volume of the wastewater tank is less than 75 m ³ and storing liquid with any vapor pressure,
5-9-D2810	40 CFR Part 63, Subpart FFFF	63FFFF-1	Process Wastewater = Tank receives, manages or treats process wastewater as defined in 40 CFR Part 63, Subpart F and 40 CFR § 63.2485(b). Wastewater Tank Usage = The wastewater tank is not used for heating wastewater, treating by means of an exothermic reaction, nor are the contents of the tank sparged. Wastewater Tank Properties = Volume of the wastewater tank is less than 75 m ³ and storing liquid with any vapor pressure,
5-9-D2820	40 CFR Part 63, Subpart FFFF	63FFFF-1	Process Wastewater = Tank receives, manages or treats process wastewater as defined in 40 CFR Part 63, Subpart F and 40 CFR § 63.2485(b). Wastewater Tank Usage = The wastewater tank is not used for heating wastewater, treating by means of an exothermic reaction, nor are the contents of the tank sparged. Wastewater Tank Properties = Volume of the wastewater tank is less than 75 m ³ and storing liquid with any vapor pressure,
5-9-D2850	30 TAC Chapter 115, Storage of VOCs	R115-1	Today's Date = Today's date is March 1, 2013 or later. Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria. Tank Description = Tank using a vapor recovery system (VRS) True Vapor Pressure = True vapor pressure is greater than or equal to 1.5 psia Product Stored = VOC other than crude oil or condensate Storage Capacity = Capacity is greater than 40,000 gallons Control Device Type = Direct-flame incinerator
5-9-D2850	40 CFR Part 60, Subpart Kb	60Kb-1	Product Stored = Volatile organic liquid Storage Capacity = Capacity is greater than or equal to 39,900 gallons (151,000 liters) Maximum True Vapor Pressure = True vapor pressure is greater than or equal to 0.75 psia but less than 11.1 psia Storage Vessel Description = CVS and control device other than a flare (fixed roof)
5-9-D2850	40 CFR Part 63, Subpart FFFF	63FFFF-1	Combination Of Control Devices = The vent stream is treated using a single control device. Process Wastewater = Tank receives, manages or treats process wastewater as defined in 40 CFR Part 63, Subpart F and 40 CFR § 63.2485(b). Wastewater Tank Usage = The wastewater tank is not used for heating wastewater, treating by means of an exothermic reaction, nor are the contents of the tank sparged. Control Devices = Thermal vapor incinerator. Performance Tests = Performance tests are used to demonstrate that the control device or combination of control devices achieves the appropriate conditions. Wastewater Tank Properties = Properties do not qualify for exemption. 2485(h)(3) = The method in 40 CFR § 63.145(i)(2) is used. Emission Control Type = Fixed roof tank vented through a CVS that routes the organic HAP vapors vented from the wastewater tank to a control

Unit ID	Regulation	Index Number	Basis of Determination*
			<p>device.</p> <p>95% Performance Tests = The performance tests are conducted to demonstrate compliance with the 20 ppmv concentration requirements.</p> <p>Compliance With 40 CFR § 63.139(c)(1) = The enclosed combustion device being used meets the 20 ppmv concentration provisions specified in 40 CFR § 63.139(c)(1)(ii).</p> <p>Closed Vent System = Closed vent system is not maintained under negative pressure and is subject to 40 CFR § 63.172.</p> <p>Halogenated = The stream is determined as non-halogenated.</p> <p>Monitoring Options = Control device is using the monitoring parameters specified in Table 13.</p> <p>Bypass Lines = No bypass lines.</p> <p>Alt 63G Mon Parameters = No alternate monitoring parameters have been approved or none have been requested.</p>
5-9-D902	30 TAC Chapter 115, Storage of VOCs	R115-1	<p>Today's Date = Today's date is March 1, 2013 or later.</p> <p>Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.</p> <p>Tank Description = Tank using a vapor recovery system (VRS)</p> <p>True Vapor Pressure = True vapor pressure is less than 1.0 psia</p> <p>Product Stored = VOC other than crude oil or condensate</p> <p>Storage Capacity = Capacity is greater than 40,000 gallons</p>
5-9-D902	40 CFR Part 60, Subpart Kb	60Kb-1	<p>Product Stored = Volatile organic liquid</p> <p>Storage Capacity = Capacity is greater than or equal to 39,900 gallons (151,000 liters)</p> <p>Maximum True Vapor Pressure = True vapor pressure is less than 0.5 psia</p>
5-9-D903	30 TAC Chapter 115, Storage of VOCs	R115-1	<p>Today's Date = Today's date is March 1, 2013 or later.</p> <p>Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.</p> <p>Tank Description = Tank using a vapor recovery system (VRS)</p> <p>True Vapor Pressure = True vapor pressure is less than 1.0 psia</p> <p>Product Stored = VOC other than crude oil or condensate</p> <p>Storage Capacity = Capacity is greater than 40,000 gallons</p>
5-9-D950	30 TAC Chapter 115, Storage of VOCs	R115-1	<p>Today's Date = Today's date is March 1, 2013 or later.</p> <p>Alternate Control Requirement = Not using an alternate method for demonstrating and documenting continuous compliance with applicable control requirements or exemption criteria.</p> <p>Tank Description = Tank does not require emission controls</p> <p>True Vapor Pressure = True vapor pressure is less than 1.0 psia</p> <p>Product Stored = VOC other than crude oil or condensate</p> <p>Storage Capacity = Capacity is greater than 1,000 gallons but less than or equal to 25,000 gallons</p>
5-8-LOAD1	30 TAC Chapter 115, Loading and Unloading of VOC	R115-1	<p>Chapter 115 Control Device Type = Control device other than a flare, vapor combustor, catalytic incinerator, direct flame incinerator, chiller, or carbon adsorption system.</p> <p>Chapter 115 Facility Type = Facility type other than a gasoline terminal, gasoline bulk plant, motor vehicle fuel dispensing facility or marine terminal.</p> <p>Alternate Control Requirement (ACR) = No alternate control requirements are being utilized.</p>

Unit ID	Regulation	Index Number	Basis of Determination*
			<p>Vapor Tight = Not all liquid and vapor lines are equipped with fittings which make vapor-tight connections that close automatically when disconnected.</p> <p>Product Transferred = Volatile organic compounds other than liquefied petroleum gas and gasoline.</p> <p>Transfer Type = Only loading.</p> <p>True Vapor Pressure = True vapor pressure greater than or equal to 0.5 psia.</p> <p>Daily Throughput = Loading greater than or equal to 20,000 gallons per day.</p> <p>Control Options = Vapor control system that maintains a control efficiency of at least 90%.</p>
5-8-LOAD2	30 TAC Chapter 115, Loading and Unloading of VOC	R115-1	<p>Chapter 115 Facility Type = Facility type other than a gasoline terminal, gasoline bulk plant, motor vehicle fuel dispensing facility or marine terminal.</p> <p>Alternate Control Requirement (ACR) = No alternate control requirements are being utilized.</p> <p>Product Transferred = Volatile organic compounds other than liquefied petroleum gas and gasoline.</p> <p>Transfer Type = Only loading.</p> <p>True Vapor Pressure = True vapor pressure less than 0.5 psia.</p>
5-8-LOAD3	30 TAC Chapter 115, Loading and Unloading of VOC	R115-1	<p>Chapter 115 Control Device Type = Vapor control system with a direct flame incinerator.</p> <p>Chapter 115 Facility Type = Facility type other than a gasoline terminal, gasoline bulk plant, motor vehicle fuel dispensing facility or marine terminal.</p> <p>Alternate Control Requirement (ACR) = No alternate control requirements are being utilized.</p> <p>Vapor Tight = Not all liquid and vapor lines are equipped with fittings which make vapor-tight connections that close automatically when disconnected.</p> <p>Product Transferred = Volatile organic compounds other than liquefied petroleum gas and gasoline.</p> <p>Transfer Type = Only unloading.</p> <p>True Vapor Pressure = True vapor pressure greater than or equal to 0.5 psia.</p> <p>Daily Throughput = Loading greater than or equal to 20,000 gallons per day.</p> <p>Control Options = Pressurized loading system.</p>
5-8-LOAD4	30 TAC Chapter 115, Loading and Unloading of VOC	R115-1	<p>Chapter 115 Control Device Type = Control device other than a flare, vapor combustor, catalytic incinerator, direct flame incinerator, chiller, or carbon adsorption system.</p> <p>Chapter 115 Facility Type = Facility type other than a gasoline terminal, gasoline bulk plant, motor vehicle fuel dispensing facility or marine terminal.</p> <p>Alternate Control Requirement (ACR) = No alternate control requirements are being utilized.</p> <p>Vapor Tight = Not all liquid and vapor lines are equipped with fittings which make vapor-tight connections that close automatically when disconnected.</p> <p>Product Transferred = Volatile organic compounds other than liquefied petroleum gas and gasoline.</p> <p>Transfer Type = Only unloading.</p> <p>True Vapor Pressure = True vapor pressure greater than or equal to 0.5 psia.</p> <p>Daily Throughput = Loading greater than or equal to 20,000 gallons per day.</p> <p>Control Options = Vapor control system that maintains a control efficiency of at least 90%.</p>
5-9-LOAD1	30 TAC Chapter 115, Loading and Unloading of VOC	R115-1	<p>Chapter 115 Facility Type = Facility type other than a gasoline terminal, gasoline bulk plant, motor vehicle fuel dispensing facility or marine terminal.</p> <p>Alternate Control Requirement (ACR) = No alternate control requirements are being utilized.</p> <p>Product Transferred = Volatile organic compounds other than liquefied petroleum gas and gasoline.</p> <p>Transfer Type = Only unloading.</p> <p>True Vapor Pressure = True vapor pressure less than 0.5 psia.</p>

Unit ID	Regulation	Index Number	Basis of Determination*
5-9-LOAD2	30 TAC Chapter 115, Loading and Unloading of VOC	R115-1	<p>Chapter 115 Control Device Type = Vapor control system with a direct flame incinerator.</p> <p>Chapter 115 Facility Type = Facility type other than a gasoline terminal, gasoline bulk plant, motor vehicle fuel dispensing facility or marine terminal.</p> <p>Alternate Control Requirement (ACR) = No alternate control requirements are being utilized.</p> <p>Vapor Tight = All liquid and vapor lines are equipped with fittings which make vapor-tight connections that close automatically when disconnected.</p> <p>Product Transferred = Volatile organic compounds other than liquefied petroleum gas and gasoline.</p> <p>Transfer Type = Only unloading.</p> <p>True Vapor Pressure = True vapor pressure greater than or equal to 0.5 psia.</p> <p>Daily Throughput = Loading greater than or equal to 20,000 gallons per day.</p> <p>Control Options = Vapor control system that maintains a control efficiency of at least 90%.</p>
5-9-LOAD3	30 TAC Chapter 115, Loading and Unloading of VOC	R115-1	<p>Chapter 115 Facility Type = Facility type other than a gasoline terminal, gasoline bulk plant, motor vehicle fuel dispensing facility or marine terminal.</p> <p>Alternate Control Requirement (ACR) = No alternate control requirements are being utilized.</p> <p>Product Transferred = Volatile organic compounds other than liquefied petroleum gas and gasoline.</p> <p>Transfer Type = Only loading.</p> <p>True Vapor Pressure = True vapor pressure less than 0.5 psia.</p>
5-9-LOAD4	30 TAC Chapter 115, Loading and Unloading of VOC	R115-1	<p>Chapter 115 Facility Type = Facility type other than a gasoline terminal, gasoline bulk plant, motor vehicle fuel dispensing facility or marine terminal.</p> <p>Alternate Control Requirement (ACR) = No alternate control requirements are being utilized.</p> <p>Product Transferred = Volatile organic compounds other than liquefied petroleum gas and gasoline.</p> <p>Transfer Type = Only loading.</p> <p>True Vapor Pressure = True vapor pressure less than 0.5 psia.</p>
5-9-LOAD5	30 TAC Chapter 115, Loading and Unloading of VOC	R115-1	<p>Chapter 115 Facility Type = Facility type other than a gasoline terminal, gasoline bulk plant, motor vehicle fuel dispensing facility or marine terminal.</p> <p>Alternate Control Requirement (ACR) = No alternate control requirements are being utilized.</p> <p>Product Transferred = Volatile organic compounds other than liquefied petroleum gas and gasoline.</p> <p>Transfer Type = Only loading.</p> <p>True Vapor Pressure = True vapor pressure less than 0.5 psia.</p>
5-5-AUXB	30 TAC Chapter 117, Subchapter B	R117-1	<p>NOx Emission Limitation = Title 30 TAC § 117.310(d)(3) [relating to mass emissions cap and trade in 30 TAC Chapter 101, Subchapter H, Division 3 and Emission Specifications for Attainment Demonstration].</p> <p>Unit Type = Other industrial, commercial, or institutional boiler.</p> <p>Maximum Rated Capacity = MRC is greater than or equal to 200 MMBtu/hr but less than 250 MMBtu/hr.</p> <p>NOx Monitoring System = Continuous emissions monitoring system.</p> <p>Fuel Flow Monitoring = Fuel flow is monitored with a totalizing fuel flow meter per 30 TAC §§ 117.140(a), 117.340(a) or 117.440(a).</p> <p>CO Emission Limitation = Title 30 TAC § 117.310(c)(1) 400 ppmv option.</p> <p>CO Monitoring System = Continuous emissions monitoring system complying with 30 TAC § 117.8100(a)(1).</p> <p>EGF System Cap Unit = The unit is not used as an electric generating facility to generate electricity for sale to the electric grid.</p> <p>Fuel Type #1 = Natural gas.</p> <p>NOx Emission Limit Average = Emission limit in parts per million by volume (ppmv).</p> <p>NOx Reductions = No NO_x reduction.</p>

Unit ID	Regulation	Index Number	Basis of Determination*
			Annual Heat Input = Annual heat input is greater than 2.2(10 ¹¹) Btu/yr, based on rolling 12-month average.
5-5-AUXB	40 CFR Part 60, Subpart Db	60Db-1	<p>Construction/Modification Date = Modified after July 9, 1997, and on or before February 28, 2005.</p> <p>D-Series Fuel Type #1 = Natural gas.</p> <p>Heat Input Capacity = Heat input capacity is greater than 100 MMBtu/hr (29 MW) but less than or equal to 250 MMBtu/hr (73 MW).</p> <p>PM Monitoring Type = No particulate monitoring.</p> <p>Opacity Monitoring Type = No particulate (opacity) monitoring.</p> <p>Subpart Da = The affected facility does not meet applicability requirements of 40 CFR Part 60, Subpart Da.</p> <p>Changes to Existing Affected Facility = No change has been made to the existing steam generating unit, which was not previously subject to 40 CFR Part 60, Subpart Db, for the sole purpose of combusting gases containing totally reduced sulfur as defined under 40 CFR § 60.281.</p> <p>NOx Monitoring Type = Continuous emission monitoring system.</p> <p>SO2 Monitoring Type = No SO₂ monitoring.</p> <p>Subpart Ea, Eb or AAAA = The affected facility does not meet applicability requirements of and is subject to 40 CFR Part 60, Subpart Ea, Eb or AAAA.</p> <p>Subpart J = The affected facility does not meet applicability requirements of 40 CFR Part 60, Subpart J.</p> <p>Subpart E = The affected facility does not meet applicability requirements of 40 CFR Part 60, Subpart E.</p> <p>Subpart KKKK = The affected facility is not a heat recovery steam generator associated with combined cycle gas turbines and that meets applicability requirements of and is subject to 40 CFR Part 60, Subpart KKKK.</p> <p>Technology Type = None.</p> <p>ACF Option - SO₂ = Other ACF or no ACF.</p> <p>Subpart Cb or BBBB = The affected facility is not covered by an EPA approved State or Federal section 111(d)/129 plan implementing 40 CFR Part 60, Subpart Cb or BBBB emission guidelines.</p> <p>Unit Type = OTHER UNIT TYPE</p> <p>ACF Option - PM = Other ACF or no ACF.</p> <p>Heat Release Rate = Natural gas oil with a heat release rate greater than 70 MBtu/hr/ft³.</p> <p>60.49Da(n) Alternative = The facility is not using the § 60.49Da(n) alternative.</p> <p>ACF Option - NOx = Other ACF or no ACF.</p> <p>60.49Da(m) Alternative = The facility is not using the § 60.49Da(m) alternative.</p>
5-9-FUG	30 TAC Chapter 115, Pet. Refinery & Petrochemicals	R115-1	<p>Agitators = The fugitive unit does not contain agitators.</p> <p>Compressor Seals = The fugitive unit contains compressor seals.</p> <p>Flanges = The fugitive unit contains flanges.</p> <p>Open-ended Valves = The fugitive unit does not contain open-ended valves.</p> <p>Pressure Relief Valves = The fugitive unit contains pressure relief valves.</p> <p>Process Drains = The fugitive unit does not have process drains.</p> <p>Pump Seals = The fugitive unit contains pump seals.</p> <p>Rupture Disks = The fugitive unit has pressure relief valves equipped with rupture disks.</p> <p>Title 30 TAC § 115.352 Applicable = Site is a petroleum refinery, synthetic organic chemical, polymer resin or methyl tert-butyl ether manufacturing process or a natural gas/gasoline processing operation as defined in 30 TAC 115.10.</p> <p>Valves (other than pressure relief and open-ended) = The fugitive unit contains valves other than pressure relief valves or open-ended valves or lines.</p>

Unit ID	Regulation	Index Number	Basis of Determination*
			<p>Alternate Control Requirement = The TCEQ Executive Director has not approved an alternate method for demonstrating and documenting continuous compliance with an alternate control requirement or exemption criteria for compressor seals or no alternate has been requested.</p> <p>Instrumentation Systems = The fugitive unit does not have instrumentation systems, as defined in 40 CFR § 63.161, that meet 40 CFR § 63.169.</p> <p>Less Than 250 Components at Site = Fugitive unit not located at site with less than 250 fugitive components.</p> <p>Sampling Connection Systems = The fugitive unit does not have sampling connection systems, as defined in 40 CFR § 63.161, that meet 40 CFR § 63.169.</p> <p>Weight Percent VOC = All components contact a process fluid that contains greater than or equal to 10% VOC by weight.</p> <p>Complying with § 115.352(1) = Valves are complying with § 115.352(1).</p> <p>Complying With § 115.352(1) = Pressure relief valves are complying with § 115.352(1).</p> <p>Complying with 30 TAC § 115.352(1) = Flanges are complying with the requirements in 30 TAC § 115.352(1).</p> <p>Reciprocating Compressors Or Positive Displacement Pumps = The fugitive unit has reciprocating compressors or positive displacement pumps used in natural gas/gasoline processing operations.</p> <p>TVP 0.002 PSIA or Less = The fugitive unit has components or systems that contact a process fluid containing VOC having a true vapor pressure less than or equal to 0.002 psia at 68 degrees Fahrenheit.</p> <p>TVP of Process Fluid VOC <= 0.044 psia at 68° F = No pressure relief valves contact a process fluid with a TVP of less than or equal to 0.044 psia at 68° F.</p> <p>TVP of Process Fluid VOC <= 0.044 psia at 68° F = Valves contact a process fluid with a TVP less than or equal to 0.044 psia at 68° F.</p> <p>TVP of Process Fluid VOC <= 0.044 PSIA AT 68□° F = Pump seals contact a process fluid containing VOC having a true vapor pressures less than or equal to 0.044 psia at 68 degrees Fahrenheit.</p> <p>Complying with 30 TAC § 115.352(1) = Pump seals are complying with the requirements in 30 TAC § 115.352(1).</p> <p>TVP of Process Fluid VOC <= 0.044 PSIA AT 68□° F = Compressor seals do not contact a process fluid containing VOC having a true vapor pressures less than or equal to 0.044 psia at 68 degrees Fahrenheit.</p> <p>TVP of Process Fluid VOC > 0.044 psia at 68° F = Valves contact a process fluid with a TVP greater than 0.044 psia at 68° F.</p> <p>TVP of Process Fluid VOC > 0.044 PSIA AT 68° F = Flanges contact a process fluid containing VOC having a TVP greater than 0.044 psia at 68 degrees Fahrenheit.</p> <p>Complying With § 115.352(1) = Compressor seals are complying with the requirements in 30 TAC § 115.352(1).</p>
5-9-FUG	40 CFR Part 60, Subpart VV	60VV-1	<p>Closed Vent (or Vapor Collection) Systems = The fugitive unit contains closed vent or vapor collection systems.</p> <p>Compressors = The fugitive unit contains compressors.</p> <p>Enclosed Combustion Device = The fugitive unit does not contain enclosed combustion devices.</p> <p>Flare = The fugitive unit does not contain flares.</p> <p>Produces Chemicals = The fugitive unit is part of a facility that produces as an intermediate or final product one or more of the chemicals listed in 40 CFR § 60.489.</p> <p>Pumps in Heavy Liquid Service = The fugitive unit contains pumps in heavy liquid service.</p> <p>Sampling Connection Systems = The fugitive unit does not contain sampling connection systems.</p> <p>Vacuum Service = The fugitive unit contains equipment in vacuum service.</p> <p>Valves in Gas/Vapor or Light Liquid Service = The fugitive unit contains valves in gas/vapor or light liquid service.</p> <p>Vapor Recovery System = The fugitive unit does not contain vapor recovery systems.</p> <p>Affected Facility = The fugitive unit is part of a facility that is an affected facility as defined in 40 CFR § 60.480(a)(2).</p> <p>Equivalent Emission Limitation = No equivalent emission limitation is used for closed vent or vapor collection systems.</p>

Unit ID	Regulation	Index Number	Basis of Determination*
			<p>Equivalent Emission Limitation = No equivalent emission limitation is used for valves in gas/vapor or light liquid service.</p> <p>Pumps in Light Liquid Service = The fugitive unit contains pumps in light liquid service.</p> <p>Complying with 40 CFR § 60.482-10 = Closed vent or vapor collection systems are complying with § 60.482-10.</p> <p>Complying with 40 CFR § 60.482-3 = Compressors are complying with § 60.482-3.</p> <p>Complying with 40 CFR § 60.482-8 = Pumps in heavy liquid service are complying with § 60.482-8.</p> <p>Equivalent Emission Limitation = No equivalent emission limitation is used for pumps in light liquid service.</p> <p>Complying with 40 CFR § 60.482-7 = Valves in gas/vapor or light liquid service are complying with § 60.482-7.</p> <p>Design Capacity = Site with a design capacity is greater than or equal to 1,000 Mg/yr.</p> <p>Flanges and Other Connectors = The fugitive unit contains flanges and other connectors.</p> <p>Open-ended Valves or Lines = The fugitive unit does not contain open-ended valves or lines.</p> <p>Pressure Relief Devices in Gas/Vapor Service = The fugitive unit contains pressure relief devices in gas/vapor service.</p> <p>Valves in Heavy Liquid Service = The fugitive unit contains valves in heavy liquid service.</p> <p>Complying with 40 CFR § 60.482-2 = Pumps in light liquid service are complying with § 60.482-2.</p> <p>Equivalent Emission Limitation = No equivalent emission limitation is used for valves in heavy liquid service.</p> <p>Produces Heavy Liquid Chemicals = The facility produces chemicals other than or in addition to heavy liquid chemicals only from heavy liquid feed or raw materials.</p> <p>Beverage Alcohol Production = The facility does not produce only beverage alcohol.</p> <p>Complying with 40 CFR § 60.482-8 = No flanges and other connectors are complying with § 60.482-8.</p> <p>Complying with 40 CFR § 60.482-8 = Valves in heavy liquid service are complying with § 60.482-8.</p> <p>Equipment in VOC Service = The facility contains equipment designed to operate in VOC service.</p>
5-9-FUG	40 CFR Part 63, Subpart FFFF	63FFFF-1	Existing Source = Fugitive unit contains equipment in an existing Miscellaneous Chemical Processing Unit.
5-9-CT3010	40 CFR Part 63, Subpart FFFF	63FFFF-1	Monitoring = The cooling water is being monitored for the presence of HAPs or other representative substances that would indicate a leak.
5-5-50	30 TAC Chapter 111, Visible Emissions	R111-1	<p>Alternate Opacity Limitation = Not complying with an alternate opacity limit under 30 TAC § 111.113.</p> <p>Vent Source = The source of the vent is not a steam generator fired by solid fossil fuel, oil or a mixture of oil and gas and is not a catalyst regenerator for a fluid bed catalytic cracking unit.</p> <p>Opacity Monitoring System = Optical instrument capable of measuring the opacity of emissions is not installed in the vent or optical instrumentation does not meet the requirements of § 111.111(a)(1)(D), or the vent stream does not qualify for the exemption in § 111.111(a)(3).</p> <p>Construction Date = After January 31, 1972</p> <p>Effluent Flow Rate = Effluent flow rate is at least 100,000 actual cubic feet per minute.</p>
5-5-50	30 TAC Chapter 115, Vent Gas Controls	R115-1	<p>Alternate Control Requirement = Alternate control is not used.</p> <p>Chapter 115 Division = The vent stream does not originate from a source for which another Division in 30 TAC Chapter 115 establishes a control requirement, emission specification, or exemption for that source.</p> <p>Combustion Exhaust = The vent stream is not from a combustion unit exhaust or the combustion unit is used as a control device for a vent stream originating from a noncombustion source subject to 30 TAC Chapter 115, Subchapter B, Division 2.</p> <p>Control Device Type = Direct flame incinerator in which the vent gas stream is burned at a temperature or at least 1300° F (704 C).</p> <p>Vent Type = Title 30 TAC Chapter 115, Subchapter B, Vent Gas Control rules are applicable and the vent is not specifically classified under the rule.</p>

Unit ID	Regulation	Index Number	Basis of Determination*
			<p>VOC Concentration = VOC concentration is less than 612 ppmv.</p> <p>VOC Concentration/Emission Rate @ Max Operating Conditions = Either the VOC concentration or emission rate is greater than the applicable exemption limit at maximum actual operating conditions or the alternate recordkeeping requirements of 30 TAC § 115.126(4) are not being selected.</p>
5-8-04	30 TAC Chapter 115, Vent Gas Controls	R115-1	<p>Alternate Control Requirement = Alternate control is not used.</p> <p>Chapter 115 Division = The vent stream does not originate from a source for which another Division in 30 TAC Chapter 115 establishes a control requirement, emission specification, or exemption for that source.</p> <p>Combustion Exhaust = The vent stream is not from a combustion unit exhaust or the combustion unit is used as a control device for a vent stream originating from a noncombustion source subject to 30 TAC Chapter 115, Subchapter B, Division 2.</p> <p>Control Device Type = Vapor recovery system, as defined in 30 TAC § 115.10, other than an afterburner, blast furnace combustion device, boiler, catalytic or direct flame incinerator, carbon adsorption system, chiller, flare or vapor combustor.</p> <p>Vent Type = Title 30 TAC Chapter 115, Subchapter B, Vent Gas Control rules are applicable and the vent is not specifically classified under the rule.</p> <p>Combined 24-Hour VOC Weight = Combined VOC weight is less than or equal to 100 pounds (45.4 kg).</p> <p>VOC Concentration/Emission Rate @ Max Operating Conditions = Either the VOC concentration or emission rate is greater than the applicable exemption limit at maximum actual operating conditions or the alternate recordkeeping requirements of 30 TAC § 115.126(4) are not being selected.</p>
5-8-D8250	40 CFR Part 63, Subpart FFFF	63FFFF-1	<p>Designated Grp1 = The emission stream is determined to be Group 1.</p> <p>Emission Standard = The TRE index is not maintained above the threshold (5.0 for a new source and 1.9 for an existing source) and a non-flare CD is being used to meet a ppmv standard per § 63.2455(a) - Table 1.1.a.i.</p> <p>Hal Device Type = No halogen scrubber or other halogen reduction device is used.</p> <p>Meets 63.988(b)(2) = The control device meets criteria in § 63.985(b)(2).</p> <p>Small Device = A small control device (defined in § 63.2550) is not being used.</p> <p>1257A1 = No design evaluation as specified in § 63.1257(a)(1) is being conducted.</p> <p>Designated Hal = The emission stream is not designated as halogenated.</p> <p>Prior Eval = The data from a prior evaluation or assessment is not used.</p> <p>Assessment Waiver = The Administrator has not granted a waiver of compliance assessment or no waiver is requested.</p> <p>Determined Hal = The emission stream is determined to be non-halogenated.</p> <p>Alt 63SS Mon Parameters = Alternate monitoring parameters or requirements have not been approved by the Administrator or have not been requested.</p> <p>Formaldehyde = The stream does not contain formaldehyde.</p> <p>Negative Pressure = The closed vent system is operated and maintained at or above atmospheric pressure.</p> <p>Bypass Line = The closed vent system contains no bypass line.</p> <p>CEMS = A CEMS is not used.</p> <p>SS Device Type = Incinerator other than a catalytic incinerator.</p>
5-8-D8720	30 TAC Chapter 115, Vent Gas Controls	R115-1	<p>Chapter 115 Division = The vent stream does not originate from a source for which another Division in 30 TAC Chapter 115 establishes a control requirement, emission specification, or exemption for that source.</p> <p>Combustion Exhaust = The vent stream is not from a combustion unit exhaust or the combustion unit is used as a control device for a vent stream originating from a noncombustion source subject to 30 TAC Chapter 115, Subchapter B, Division 2.</p> <p>Vent Type = Title 30 TAC Chapter 115, Subchapter B, Vent Gas Control rules are applicable and the vent is not specifically classified under the rule.</p> <p>Combined 24-Hour VOC Weight = Combined VOC weight is less than or equal to 100 pounds (45.4 kg).</p> <p>VOC Concentration/Emission Rate @ Max Operating Conditions = The VOC concentration or emission rate is less than the applicable exemption limit</p>

Unit ID	Regulation	Index Number	Basis of Determination*
			at maximum actual operating conditions and the alternate recordkeeping requirements of 30 TAC § 115.126(4) are being selected.
GRP-INC	40 CFR Part 63, Subpart FFFF	63FFFF-1	<p>Designated Grp1 = The emission stream is designated as Group 1.</p> <p>Emission Standard = The TRE index is not maintained above the threshold (5.0 for a new source and 1.9 for an existing source) and a non-flare CD is being used to meet a ppmv standard per § 63.2455(a) - Table 1.1.a.i.</p> <p>Hal Device Type = No halogen scrubber or other halogen reduction device is used.</p> <p>Meets 63.988(b)(2) = The control device does not meet the criteria in § 63.985(b)(2).</p> <p>Small Device = A small control device (defined in § 63.2550) is not being used.</p> <p>Designated Hal = The emission stream is not designated as halogenated.</p> <p>Prior Eval = The data from a prior evaluation or assessment is not used.</p> <p>Assessment Waiver = The Administrator has not granted a waiver of compliance assessment or no waiver is requested.</p> <p>Determined Hal = The emission stream is determined to be non-halogenated.</p> <p>Alt 63SS Mon Parameters = Alternate monitoring parameters or requirements have not been approved by the Administrator or have not been requested.</p> <p>Formaldehyde = The stream does not contain formaldehyde.</p> <p>Negative Pressure = The closed vent system is operated and maintained at or above atmospheric pressure.</p> <p>Bypass Line = The closed vent system contains no bypass line.</p> <p>CEMS = A CEMS is not used.</p> <p>SS Device Type = Incinerator other than a catalytic incinerator.</p>
5-9-D1451	30 TAC Chapter 115, Industrial Wastewater	R115-1	<p>Petroleum Refinery = The affected source category is not a petroleum refinery.</p> <p>Wastewater Component Type = The component is not a wet weather retention basin, exempted by §115.147(2), not a biotreatment unit.</p> <p>Alternate Control Requirement = An alternate control requirement (ACR) or exemption criteria in accordance with 30 TAC § 115.910 is not used.</p> <p>Roof or Seal Type = The wastewater component does not have a floating roof or internal floating roof.</p> <p>Control Devices = Enclosed non-catalytic combustion device.</p> <p>90% Overall Control Option = The unit is complying with the control requirements of 30 TAC § 115.142.</p> <p>Monitoring Type = The monitoring requirements of 30 TAC §§ 115.144(3)(A) - (H) are being used.</p> <p>Safety Hazard Exemption = No safety hazard exemption has been requested or none has been approved.</p>
5-5-IN5100	40 CFR Part 63, Subpart EEE	63EEE-1	<p>CO/THC Standard = Complying with the CO standard in § 63.1219(a)(5)(i) or (b)(5)(i).</p> <p>Existing Source = The incinerator is an existing source (construction or reconstruction commenced on or before April 20, 2004).</p> <p>Baghouse = The furnace is not equipped with a baghouse.</p> <p>Control System = The incinerator is equipped with a waste heat boiler or a dry air pollution control system.</p> <p>Inlet Temp = The gas temperature at the inlet of the initial PM control device is greater than 400° F.</p> <p>Dioxin-Listed = The furnace does not burn the dioxin-listed hazardous wastes F020, F021, F022, F023, F026, or F027.</p> <p>Hg Feedrate = Extrapolation of feedrate levels is used for Hg.</p> <p>ALT Metals = Complying with the particulate matter standards.</p> <p>DRE Previous Test = DRE testing during the initial comprehensive performance test is used to document conformance with the DRE standard.</p> <p>MET Feedrate = Extrapolation of feedrate levels is used for semivolatile and low volatile metals.</p>

Unit ID	Regulation	Index Number	Basis of Determination*
5-8-D8420	40 CFR Part 63, Subpart FFFF	63FFFF-1	<p>Series Of Processes = The wastewater stream is treated using a single treatment process.</p> <p>Biological Treatment Process = Non-biological treatment process.</p> <p>Wastewater Stream Designation = The wastewater stream is designated as Group 1 per 40 CFR § 63.132(e).</p> <p>Wastewater Stream Treatment = Resource Conservation and Recovery Act (RCRA) unit option.</p>
5-8-T8400A	40 CFR Part 63, Subpart FFFF	63FFFF-1	<p>Series Of Processes = The wastewater stream is treated using a single treatment process.</p> <p>Biological Treatment Process = Non-biological treatment process.</p> <p>Wastewater Stream Designation = The wastewater stream is designated as Group 1 per 40 CFR § 63.132(e).</p> <p>Wastewater Stream Treatment = Resource Conservation and Recovery Act (RCRA) unit option.</p>
GRP-MCPU	40 CFR Part 63, Subpart FFFF	63FFFF-1	<p>>1000 lb/yr = The process has uncontrolled hydrogen halide and halogen HAP emissions from process vents of less than 1,000 lb/yr.</p> <p>Ammonium Sulfate = The MCPU does not include the manufacture of ammonium sulfate as a by-product, or the slurry entering the by-product manufacturing process contains 50 parts per million by weight (ppmw) HAP or less or 10 ppmw benzene or less.</p> <p>Startup 2003 = The affected source startup was before November 10, 2003.</p> <p>Other Operations = The MCPU includes operations other than those listed in § 63.2435(c).</p> <p>Shared Batch Vent = The MCPU does not include a batch process vent that also is part of a CMPU as defined in subparts F and G of this part 63.</p> <p>63.100 CMPU = The MCPU is not a CMPU defined in § 63.100.</p> <p>New Source = The MCPU is an existing affected source.</p> <p>PUG = The MCPU is not part of a process unit group (PUG).</p> <p>G2/<1000 lb/yr = The process includes Group 2 batch process vents and/or uncontrolled hydrogen halide and halogen HAP emissions from the sum of all batch and continuous process vents less than 1,000 lb/yr.</p> <p>Startup 2002 = The affected source initial startup was before April 4, 2002.</p> <p>2525E1 = The MCPU does not meet one of the situations described in paragraph § 63.100(e)(1)(i), (ii) or (iii).</p> <p>PP Alt = The MCPU is complying with the emission limitations and work practice standards contained in Tables 1 through 7.</p> <p>Batch Process Vents = The source does not include batch process vents.</p>

* - The “unit attributes” or operating conditions that determine what requirements apply

NSR versus Title V FOP

The state of Texas has two Air permitting programs, New Source Review (NSR) and Title V Federal Operating Permits. The two programs are substantially different both in intent and permit content.

NSR is a preconstruction permitting program authorized by the Texas Clean Air Act and Title I of the Federal Clean Air Act (FCAA). The processing of these permits is governed by 30 Texas Administrative Code (TAC) Chapter 116.111. The Title V Federal Operating Program is a federal program authorized under Title V of the FCAA that has been delegated to the state of Texas to administer and is governed by 30 TAC Chapter 122. The major differences between the two permitting programs are listed in the table below:

NSR Permit	Federal Operating Permit(FOP)
Issued Prior to new Construction or modification of an existing facility	For initial permit with application shield, can be issued after operation commences; significant revisions require approval prior to operation.
Authorizes air emissions	Codifies existing applicable requirements, does not authorize new emissions
Ensures issued permits are protective of the environment and human health by conducting a health effects review and that requirement for best available control technology (BACT) is implemented.	Applicable requirements listed in permit are used by the inspectors to ensure proper operation of the site as authorized. Ensures that adequate monitoring is in place to allow compliance determination with the FOP.
Up to two Public notices may be required. Opportunity for public comment and contested case hearings for some authorizations.	One public notice required. Opportunity for public comments. No contested case hearings.
Applies to all point source emissions in the state.	Applies to all major sources and some non-major sources identified by the EPA.
Applies to facilities: a portion of site or individual emission sources	One or multiple FOPs cover the entire site (consists of multiple facilities)
Permits include terms and conditions under which the applicant must construct and operate its various equipment and processes on a facility basis.	Permits include terms and conditions that specify the general operational requirements of the site; and also include codification of all applicable requirements for emission units at the site.
Opportunity for EPA review for Federal Prevention of Significant Deterioration (PSD) and Nonattainment (NA) permits for major sources.	Opportunity for EPA review, Affected states review, and a Public petition period for every FOP.
Permits have a table listing maximum emission limits for pollutants	Permit has an applicable requirements table and Periodic Monitoring (PM) / Compliance Assurance Monitoring (CAM) tables which document applicable monitoring requirements.
Permits can be altered or amended upon application by company. Permits must be issued before construction or modification of facilities can begin.	Permits can be revised through several revision processes, which provide for different levels of public notice and opportunity to comment. Changes that would be significant revisions require that a revised permit be issued before those changes can be operated.
NSR permits are issued independent of FOP requirements.	FOP are independent of NSR permits, but contain a list of all NSR permits incorporated by reference

New Source Review Requirements

Below is a list of the New Source Review (NSR) permits for the permitted area. These NSR permits are incorporated by reference into the operating permit and are enforceable under it. These permits can be found in the main TCEQ file room, located on the first floor of Building E, 12100 Park 35 Circle, Austin, Texas. The Public Education Program may be contacted at 1-800-687-4040 or the Air Permits Division (APD) may be contacted at 1-512-239-1250 for help with any question.

Additionally, the site contains emission units that are permitted by rule under the requirements of 30 TAC Chapter 106, Permits by Rule. The following table specifies the permits by rule that apply to the site. All current permits by rule are contained in Chapter 106. Outdated 30 TAC Chapter 106 permits by rule may be viewed at the following Web site:

www.tceq.texas.gov/permitting/air/permitbyrule/historical_rules/old106list/index106.html

Outdated Standard Exemption lists may be viewed at the following Web site:

www.tceq.texas.gov/permitting/air/permitbyrule/historical_rules/oldselist/se_index.html

Prevention of Significant Deterioration (PSD) Permits	
PSD Permit No.: PSDTX193M3	Issuance Date: 01/15/2015
PSD Permit No.: PSDTX959	Issuance Date: 09/10/2014
Title 30 TAC Chapter 116 Permits, Special Permits, and Other Authorizations (Other Than Permits By Rule, PSD Permits, or NA Permits) for the Application Area.	
Authorization No.: 40799	Issuance Date: 09/10/2014
Authorization No.: 7223A	Issuance Date: 01/15/2015
Authorization No.: 8074A	Issuance Date: 01/06/2012
Permits By Rule (30 TAC Chapter 106) for the Application Area	
Number: 106.261	Version No./Date: 11/01/2003
Number: 106.262	Version No./Date: 11/01/2003
Number: 106.472	Version No./Date: 09/04/2000
Number: 106.476	Version No./Date: 09/04/2000
Number: 106.478	Version No./Date: 09/04/2000

Emission Units and Emission Points

In air permitting terminology, any source capable of generating emissions (for example, an engine or a sandblasting area) is called an Emission Unit. For purposes of Title V, emission units are specifically listed in the operating permit when they have applicable requirements other than New Source Review (NSR), or when they are listed in the permit shield table.

The actual physical location where the emissions enter the atmosphere (for example, an engine stack or a sandblasting yard) is called an emission point. For New Source Review preconstruction permitting purposes, every emission unit has an associated emission point. Emission limits are listed in an NSR permit, associated with an emission point. This list of emission points and emission limits per pollutant is commonly referred to as the "Maximum Allowable Emission Rate Table", or "MAERT" for short. Specifically, the MAERT lists the Emission Point Number (EPN) that identifies the emission point, followed immediately by the Source Name, identifying the emission unit that is the source of those emissions on this table.

Thus, by reference, an emission unit in a Title V operating permit is linked by reference number to an NSR authorization, and its related emission point.

Monitoring Sufficiency

Federal and state rules, 40 CFR § 70.6(a)(3)(i)(B) and 30 TAC § 122.142(c) respectively, require that each federal operating permit include additional monitoring for applicable requirements that lack periodic or instrumental monitoring (which may include recordkeeping that serves as monitoring) that yields reliable data from a relevant time period that are representative of the emission unit's compliance with the applicable emission limitation or standard. Furthermore, the federal operating permit must include compliance assurance monitoring (CAM) requirements for emission sources that meet the applicability criteria of 40 CFR Part 64 in accordance with 40 CFR § 70.6(a)(3)(i)(A) and 30 TAC § 122.604(b).

With the exception of any emission units listed in the Periodic Monitoring or CAM Summaries in the FOP, the TCEQ Executive Director has determined that the permit contains sufficient monitoring, testing, recordkeeping, and reporting requirements that assure compliance with the applicable requirements. If applicable, each emission unit that requires additional monitoring in the form of periodic monitoring or CAM is described in further detail under the Rationale for CAM/PM Methods Selected section following this paragraph.

Rationale for Compliance Assurance Monitoring (CAM)/ Periodic Monitoring Methods Selected

Periodic Monitoring:

The Federal Clean Air Act requires that each federal operating permit include monitoring sufficient to assure compliance with the terms and conditions of the permit. Most of the emission limits and standards applicable to emission units at Title V sources include adequate monitoring to show that the units meet the limits and standards. For those requirements that do not include monitoring, or where the monitoring is not sufficient to assure compliance, the federal operating permit must include such monitoring for the emission units affected. The following emission units are subject to periodic monitoring requirements because the emission units are subject to an emission limitation or standard for an air pollutant (or surrogate thereof) in an applicable requirement that does not already require monitoring, or the monitoring for the applicable requirement is not sufficient to assure compliance:

Unit/Group/Process Information	
ID No.: 5-5-50	
Control Device ID No.: N/A	Control Device Type: N/A
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 111, Visible Emissions	SOP Index No.: R111-1
Pollutant: OPACITY	Main Standard: § 111.111(a)(1)(C)
Monitoring Information	
Indicator: Visible Emissions	
Minimum Frequency: once per week	
Averaging Period: n/a	
Deviation Limit: There shall be no visible emissions. If visible emissions are observed, the permit holder will either report a deviation or perform Test Method 9 and opacity shall not exceed 15%.	
<p>Basis of monitoring:</p> <p>The option to perform opacity readings or visible emissions to demonstrate compliance is consistent with EPA Reference Test Method 9 and 22. Monitoring specifications and procedures for the opacity are consistent with federal requirements and include the EPA's Test Method 9 for determining opacity by visual observations. The monitoring specifications and procedures for the visible emissions monitoring are similar to "EPA Reference Method 22" procedures.</p>	

Unit/Group/Process Information	
ID Nos.: 5-8-D8550, 5-9-D1000, 5-9-D1450, 5-9-D2850	
Control Device ID No.: N/A	Control Device Type: Vapor Collection System
Applicable Regulatory Requirement	
Name: 40 CFR Part 60, Subpart Kb	SOP Index No.: 60Kb-1
Pollutant: VOC	Main Standard: [G]§ 60.112b(a)(3)
Monitoring Information	
Indicator: VOC Concentration	
Minimum Frequency: Once per year	
Averaging Period: n/a	
Deviation Limit: The closed vent system shall be designed and operated with no detectable VOC emissions of less than 500 ppm above background.	
<p>Basis of monitoring:</p> <p>It is widely practiced and accepted to monitor the VOC concentration at the outlet of a control device by use of a portable analyzer with procedures such as EPA Test Method 25A or a VOC CEMS. The measured concentration along with stack flow rate or AP-42 factors and fuel consumption records may be used to demonstrate compliance with an underlying emission limit or standard. Outlet VOC concentration has been used as an indicator of VOC emissions in many federal rules including 40 CFR Part 60, Subpart III, 40 CFR Part 60, Subpart NNN, 40 CFR Part 60, Subpart RRR, 40 CFR Part 61, Subpart BB, 40 CFR Part 61, Subpart FF, 40 CFR Part 63, Subpart R, 40 CFR Part 63, Subpart DD, and 40 CFR Part 63, Subpart HH.</p>	

Unit/Group/Process Information	
ID Nos.: 5-8-D8550, 5-9-D1000, 5-9-D1450, 5-9-D2850	
Control Device ID No.: N/A	Control Device Type: Vapor Collection System
Applicable Regulatory Requirement	
Name: 40 CFR Part 60, Subpart Kb	SOP Index No.: 60Kb-1
Pollutant: VOC	Main Standard: [G]§ 60.112b(a)(3)
Monitoring Information	
Indicator: Visual Inspection	
Minimum Frequency: Once per year	
Averaging Period: n/a	
Deviation Limit: Failure to visually inspect all components of the vapor collection system for defects.	
<p>Basis of monitoring:</p> <p>It is widely practiced and accepted to use work practice as a monitoring option to demonstrate compliance. Preventive maintenance and visual inspections of control equipment, as recommended by the manufacturer, conducted by the owner or operator can ensure that the unit is operating properly. The work practice requirements prescribe that preventive maintenance and/or visual inspections be performed and a recorded in a log. This option assures that the owner or operator is adequately maintaining the control equipment.</p>	

Unit/Group/Process Information	
ID No.: 5-8-D8550	
Control Device ID No.: 5-8-T8710	Control Device Type: Absorber (Direct Absorption)
Applicable Regulatory Requirement	
Name: 40 CFR Part 60, Subpart Kb	SOP Index No.: 60Kb-1
Pollutant: VOC	Main Standard: [G]§ 60.112b(a)(3)
Monitoring Information	
Indicator: Liquid Flow Rate	
Minimum Frequency: once per week	
Averaging Period: n/a*	
Deviation Limit: The minimum liquid flow rate shall not be below 2.0 gpm.	
Basis of monitoring: The option to monitor the liquid flow rate, liquid supply pressure, and the liquid flow rate and gas flow rate are provided as monitoring options because monitoring these parameters can indicate malfunctions in the liquid pumping equipment, blockage of pipes or spray nozzles.	

*The permit holder may elect to collect monitoring data on a more frequent basis and calculate the average as specified by the minimum frequency, for purposes of determining whether a deviation has occurred. However, the additional data points must be collected on a regular basis and shall not be collected and used in particular instances to avoid reporting deviations.

Unit/Group/Process Information	
ID No.: 5-8-D8550	
Control Device ID No.: 5-8-T8710	Control Device Type: Absorber (Direct Absorption)
Applicable Regulatory Requirement	
Name: 40 CFR Part 60, Subpart Kb	SOP Index No.: 60Kb-1
Pollutant: VOC	Main Standard: [G]§ 60.112b(a)(3)
Monitoring Information	
Indicator: Temperature	
Minimum Frequency: once per week	
Averaging Period: n/a*	
Deviation Limit: Maximum tower operating temperature shall not exceed 80 degrees C.	
Basis of monitoring: The option to monitor tower operating temperature can indicate the efficiency of the tower based on the vapor pressure of the VOC. The tower is controlling NEOL. As the NEOL's vapor pressure increases, more scrubbing liquid emits from the tower. Using engineering calculations, it has been determined that up to 98% VOC capture efficiency can be achieved. Temperature can be an indicator of proper operation of the control device tower.	

Unit/Group/Process Information	
ID No.: 5-9-D1000, 5-9-D1450, 5-9-D2850	
Control Device ID No.: 5-4-T05	Control Device Type: Thermal Incinerator (Direct Flame Incinerator/Regenerative Thermal Oxidizer)
Applicable Regulatory Requirement	
Name: 40 CFR Part 60, Subpart Kb	SOP Index No.: 60Kb-1
Pollutant: VOC	Main Standard: [G]§ 60.112b(a)(3)
Monitoring Information	
Indicator: Combustion Temperature / Exhaust Gas Temperature	
Minimum Frequency: Once per week	
Averaging Period: n/a*	
Deviation Limit: The minimum combustion temperature shall not be below 740 degrees C.	
<p>Basis of monitoring:</p> <p>It is widely practiced and accepted to use performance tests, manufacturer's recommendations, engineering calculations and/or historical data to establish a minimum temperature for thermal incinerators. This minimum temperature must be maintained in order for the proper destruction efficiency. Operation below the minimum combustion temperature will result in incomplete combustion and potential noncompliance with emission limitations and/or standards. The monitoring of the combustion temperature of a thermal incinerator is commonly required in federal and state rules, including: 40 CFR Part 60, Subparts III, NNN, QQQ, and RRR; 40 CFR Part 61, Subparts BB and FF; 40 CFR Part 63, Subparts G, R, DD, EE, and HH; and 30 TAC Chapter 115.</p>	

*The permit holder may elect to collect monitoring data on a more frequent basis and calculate the average as specified by the minimum frequency, for purposes of determining whether a deviation has occurred. However, the additional data points must be collected on a regular basis and shall not be collected and used in particular instances to avoid reporting deviations.

Available Unit Attribute Forms

OP-UA1 - Miscellaneous and Generic Unit Attributes
OP-UA2 - Stationary Reciprocating Internal Combustion Engine Attributes
OP-UA3 - Storage Tank/Vessel Attributes
OP-UA4 - Loading/Unloading Operations Attributes
OP-UA5 - Process Heater/Furnace Attributes
OP-UA6 - Boiler/Steam Generator/Steam Generating Unit Attributes
OP-UA7 - Flare Attributes
OP-UA8 - Coal Preparation Plant Attributes
OP-UA9 - Nonmetallic Mineral Process Plant Attributes
OP-UA10 - Gas Sweetening/Sulfur Recovery Unit Attributes
OP-UA11 - Stationary Turbine Attributes
OP-UA12 - Fugitive Emission Unit Attributes
OP-UA13 - Industrial Process Cooling Tower Attributes
OP-UA14 - Water Separator Attributes
OP-UA15 - Emission Point/Stationary Vent/Distillation Operation/Process Vent Attributes
OP-UA16 - Solvent Degreasing Machine Attributes
OP-UA17 - Distillation Unit Attributes
OP-UA18 - Surface Coating Operations Attributes
OP-UA19 - Wastewater Unit Attributes
OP-UA20 - Asphalt Operations Attributes
OP-UA21 - Grain Elevator Attributes
OP-UA22 - Printing Attributes
OP-UA24 - Wool Fiberglass Insulation Manufacturing Plant Attributes
OP-UA25 - Synthetic Fiber Production Attributes
OP-UA26 - Electroplating and Anodizing Unit Attributes
OP-UA27 - Nitric Acid Manufacturing Attributes
OP-UA28 - Polymer Manufacturing Attributes
OP-UA29 - Glass Manufacturing Unit Attributes
OP-UA30 - Kraft, Soda, Sulfite, and Stand-Alone Semicheical Pulp Mill Attributes
OP-UA31 - Lead Smelting Attributes
OP-UA32 - Copper and Zinc Smelting/Brass and Bronze Production Attributes
OP-UA33 - Metallic Mineral Processing Plant Attributes
OP-UA34 - Pharmaceutical Manufacturing
OP-UA35 - Incinerator Attributes
OP-UA36 - Steel Plant Unit Attributes
OP-UA37 - Basic Oxygen Process Furnace Unit Attributes
OP-UA38 - Lead-Acid Battery Manufacturing Plant Attributes
OP-UA39 - Sterilization Source Attributes
OP-UA40 - Ferroalloy Production Facility Attributes
OP-UA41 - Dry Cleaning Facility Attributes
OP-UA42 - Phosphate Fertilizer Manufacturing Attributes
OP-UA43 - Sulfuric Acid Production Attributes
OP-UA44 - Municipal Solid Waste Landfill/Waste Disposal Site Attributes
OP-UA45 - Surface Impoundment Attributes
OP-UA46 - Epoxy Resins and Non-Nylon Polyamides Production Attributes
OP-UA47 - Ship Building and Ship Repair Unit Attributes
OP-UA48 - Air Oxidation Unit Process Attributes
OP-UA49 - Vacuum-Producing System Attributes
OP-UA50 - Fluid Catalytic Cracking Unit Catalyst Regenerator/Fuel Gas Combustion Device/Claus Sulfur Recovery Plant Attributes
OP-UA51 - Dryer/Kiln/Oven Attributes

OP-UA52 - Closed Vent Systems and Control Devices
OP-UA53 - Beryllium Processing Attributes
OP-UA54 - Mercury Chlor-Alkali Cell Attributes
OP-UA55 - Transfer System Attributes
OP-UA56 - Vinyl Chloride Process Attributes
OP-UA57 - Cleaning/Depainting Operation Attributes
OP-UA58 - Treatment Process Attributes
OP-UA59 - Coke By-Product Recovery Plant Attributes
OP-UA60 - Chemical Manufacturing Process Unit Attributes
OP-UA61 - Pulp, Paper, or Paperboard Producing Process Attributes
OP-UA62 - Glycol Dehydration Unit Attributes
OP-UA63 - Vegetable Oil Production Attributes